United States Courts Southern District of Texas FILED

MAY 0 7 2024

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA)	
v.)))	Criminal No. 4:24-cr-221 UNDER SEAL
IRADA AKHOUNDOVA,)	
)	
Defendant)	

MOTION TO UNSEAL

The United States of America respectfully moves to unseal the docket and all filings and transcripts of hearings in this case with one exception. The government requests that ECF No. 14 in this matter, which references a list of witnesses and subjects that the defendant is directed to have no contact with, be redacted in accordance with the attached proposed redactions prior to unsealing. *See* Exhibit A (Proposed Redacted ECF No. 14). Except for ECF No. 14, the government submits that the justifications for sealing in the government's motion to seal (ECF No. 3) no longer apply.

Government counsel has conferred with counsel for Defendant Akhoundova, who consents to this motion to unseal. The United States thus respectfully requests that the Court unseal the docket and all filings and transcripts of hearings in this case in accordance with this Motion.

Respectfully submitted,

COREY R. AMUNDSON Chief, Public Integrity Section Criminal Division US Department of Justice

By: /s/ Marco A. Palmieri
Marco A. Palmieri
Rosaleen O'Gara
Celia Choy
Attorneys for the United States

JENNIFER KENNEDY GELLIE
Executive Deputy Chief
performing the duties of Chief
Counterintelligence and Export Control Section
National Security Division
U.S. Department of Justice

By: /s/ Garrett Coyle
Garrett Coyle
Attorney for the United States